

Vernon County/HZW
General

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • David A. Shott, Director

DIVISION OF ENVIRONMENTAL QUALITY

Southwest Regional Office

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RECEIVED

SEP 29 1994

September 26, 1994

HAZARDOUS WASTE PROGRAM
MISSOURI DEPARTMENT OF

NATURAL RESOURCES
Certified Mail
Z 049 878 322

LOW# 94-SW.018

Mr. Kent Wood
Nevada Auto Mall
2501 East Austin
Nevada, MO 64772



Dear Mr. Wood:

Please find enclosed the copy of the Inspection Record and Checklist for the Nevada Auto Mall in Vernon County, Missouri. The inspection was conducted under the authority of Sections 260.375(9) and 260.377 RSMo for the purpose of determining the compliance status of the facility relating to hazardous waste handling and disposal. Any Federal regulations cited are those adopted by reference in State regulations.

During the September 22, 1994, Hazardous Waste Compliance Inspection at the facility, it was determined that the Nevada Auto Mall is a small quantity generator of hazardous waste. Two class I violations of the Hazardous Waste Law and regulations were observed, however, due to the recent change in ownership and operations at the facility, no formal Notice of Violation was issued.

The following violations were observed during the September 22, 1994, inspection at the facility:

1. Failure of a generator of hazardous waste to transport that waste within 180 days; 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(e). Generators of hazardous waste are allowed to store hazardous waste on-site for up to 180 days without a permit. Some of the waste at the Nevada Auto Mall facility had apparently been on site since the last shipment made in August, 1993.

2. Failure of a generator to keep waste labeled and marked per DOT during entire on-site storage period; 10 CSR 25-5.262(2)(C)1. Although the containers had a white hazardous waste label on them, the labels were not completed or were illegible. The Missouri Hazardous Waste regulations require the containers to be labeled during the entire on-site storage period.
3. Failure to provide the beginning date of accumulation on containers of hazardous waste; 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2). The beginning date of accumulation must be provided on all containers of hazardous waste during the entire on-site storage period.
4. Failure to clearly mark containers as "hazardous waste"; 10 CSR 25-5.262(I) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3). Although the containers of hazardous waste in the storage area had labels on them, the words "hazardous waste" were not legible.
5. Failure of a generator to make available the appropriate placards for the transporter; 10 CSR 25-5.262(1) incorporating 40 CFR 262.33. The regulations require generators of hazardous waste to make the appropriate placard(s) available to the initial transporter of the hazardous waste.
6. Failure to keep containers of hazardous waste closed during satellite accumulation; 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173. The five gallon container of spent solvent in the paint mix room was not securely closed. Containers of hazardous waste must be kept closed at all times except when adding or removing the waste.
7. Failure to mark containers of hazardous waste in satellite accumulation identifying contents and beginning date of accumulation; 10 CSR 25-5.262(2)(C)3. The containers of hazardous waste in satellite accumulation areas must be properly marked to identify the waste and the beginning date of accumulation must be provided. Generally the words "Hazardous Waste" on the container would be sufficient for containers in satellite storage except where there could be more than one type of waste accumulated. The beginning date of accumulation must be provided, showing the date the waste was first placed into the container.

To demonstrate a return to compliance with the Hazardous Waste Law and regulations, Nevada Auto Mall must submit the following documentation by October 28, 1994:

1. A copy of the manifest demonstrating that the accumulated spent solvents have been shipped off-site for disposal. It was indicated during the inspection that the Chemical Waste Management company will be picking the waste up twice per year. This will satisfy the storage time requirements.
2. Photographic documentation demonstrating that the containers of hazardous waste are properly marked and labeled and certification that they will be properly marked and labeled in the future.
3. Photographic documentation demonstrating that the date of accumulation has been provided on all containers of hazardous waste and certification that it will be provided in the future.
4. Photographic documentation demonstrating that the containers of hazardous waste are clearly marked with the words "Hazardous Waste" and certification that they will be so marked in the future.
5. Certification that the appropriate placard is available at the facility.
6. Photographic documentation demonstrating that the satellite accumulation container(s) are closed and certification that they will be kept closed at all times except when adding or removing the waste.
7. Photographic documentation demonstrating that the satellite accumulation container is marked identifying the contents and that the beginning date of accumulation is provided. The containers should be marked with the words "hazardous waste" or other words identifying the contents. The date can be provided on tape which can be replaced when the container is emptied and begun to be refilled.
8. A copy of the completed Notification of Hazardous Waste Activity form demonstrating the current ownership of the facility. The original is to be sent to the address on the form.

Nevada Auto Mall LOW
September 26, 1994
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The submittals must address each item, especially where certification of future actions is required. The aforementioned documentation must be submitted to this office to the attention of Charles L. Kroeger. A copy of the submittals is to be sent to Mr. Tom Judge, Department of Natural Resources, Waste Management Program, P.O. Box 176, Jefferson City, MO 65102.

If you have any questions, please contact Charles L. Kroeger of this office.

Sincerely,

SOUTHWEST REGIONAL OFFICE

A handwritten signature in dark ink, appearing to read "R. Bruce Martin", is written over the typed name.

R. Bruce Martin
Regional Director

RBM/clk

enc.

c: Tom Judge, HWP, Enf.



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
SMALL QUANTITY GENERATOR
INSPECTION RECORD AND CHECKLIST

S
SQG-INSP.

ONLY FOR FACILITIES THAT GENERATE/ACCUMULATE < 1000 Kg (2,200 lbs. or approximately, 5 drums)

NAME <i>McDermott Nevada Auto Metal</i>		DATE <i>9/22/94</i>	EPA I.D. NUMBER <i>MO2985801399</i>
ADDRESS <i>2501 E Austin</i>		RR NO. —	MO I.D. NUMBER <i>20226</i>
CITY <i>Nevada</i>	NUMBER OF EMPLOYEES <i>64772 35</i>	YEARS AT SITE <i>~5 years</i>	TELEPHONE NUMBER <i>417-667-3385</i>

FACILITY REPRESENTATIVE(S), TITLE(S)

Kent Wood, Body Shop Mgr *Don Scott Service Manager*

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT

Under New Ownership as of July 15
Auto Service, Sales, & Paint & Body Shop.

Waste oil to tank inside - part used in W.O. burners to heat service dept. rest is handed off by J.W. Oil

Body Shop spent solvents - cleaning spray equipment & excess paint. goes to gun cleaner - remove to 5 gal container (sat. accum). to storage drum clean gun cleaner (5 gal) 1x/mo outside

have contracted with Chem Waste to pick up waste 2x year.

WASTE STREAMS

	DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
1.	<i>excess paint & spent solvents from cleanup of painting equipment</i>	<i>55 gal / 3 mos</i>	<i>D001 F003 F005</i>	<i>Chem waste Management possibly 2X year</i>
2.	<i>waste oil</i>			<i>SW oil</i>
3.				
4.				
5.				

CHECK ALL THAT APPLY (Specify if possible)

- | | | |
|---------------------------------------|---|---|
| <input type="checkbox"/> NPDES Permit | <input type="checkbox"/> Lead/Acid Batteries | <input type="checkbox"/> POTW |
| <input type="checkbox"/> Septic Tank | <input type="checkbox"/> H.W. Burner/Blender/Marketer | <input type="checkbox"/> Solid Waste Landfill |
| <input type="checkbox"/> Air Permit | <input type="checkbox"/> Precious Metal Reclamation | <input type="checkbox"/> Waste Water Pretreatment |

7. <input checked="" type="checkbox"/> Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.	GOR	COMMENTS		
D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES				
1. <input checked="" type="checkbox"/> Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.31	GPT	COMMENTS <i>4 in shop.</i> <i>Spill kit provided by Chem Waste M.</i>		
2. <input checked="" type="checkbox"/> Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) and properly tested and maintained - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34 (d)(4) referencing 40 CFR 265 Subpart C.	GPT			
3. <input checked="" type="checkbox"/> Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(d)	GPT			
4. <input checked="" type="checkbox"/> Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.33	GPT			
5. <input checked="" type="checkbox"/> Emergency coordinator's name and phone number posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ			
6. <input checked="" type="checkbox"/> Telephone number of fire department posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ			
7. <input checked="" type="checkbox"/> Location of fire extinguisher and spill control equipment posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ			
8. <input checked="" type="checkbox"/> Employees familiar with waste handling and emergency procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(iii)	GSQ			
9. <input checked="" type="checkbox"/> Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)	GPT			
10. <input checked="" type="checkbox"/> Telephone or two-way radio onsite and capable of summoning local fire or police dept. - 10 CSR 25-5.262 (1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(b)	GPT			
E. SQG TANKS				
TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1.				
2.				
3.				
1. <input type="checkbox"/> Uncovered tanks have 2 ft. freeboard or containment system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(3)	GPT	COMMENTS 		
2. <input type="checkbox"/> Continuously fed tanks equipped with a feed cut-off system or a proper by-pass system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(4)	GPT			
3. <input type="checkbox"/> Waste and/or treatment method is compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(2)	GPT			
4. <input type="checkbox"/> Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(f)	GPT			
5. <input type="checkbox"/> Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(1)	GPT			
6. <input type="checkbox"/> Ignitable or reactive wastes in covered tanks treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(2)	GPT			
7. <input type="checkbox"/> Volatiles with vapor pressure > 78 mm Hg @ 25° C not placed in open tanks - 10 CSR 25-5.262(2)(C)2.D.(i)	GOR			
8. <input type="checkbox"/> Wastes and residues removed from tank and equipment, and handled properly upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(d)	GPT			
9. <input type="checkbox"/> Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3).	GPT			

10. <input type="checkbox"/> Inspection of waste feed cut off, bypass system, monitoring data and freeboard each operating day - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)	GPT	COMMENTS
11. <input type="checkbox"/> Weekly inspection of confinement structure, construction materials and general area for leaks, corrosion or discharges - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)5	GPT	
12. <input type="checkbox"/> Waste oil tanks in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR	

PART 2: RECORDS INSPECTION

F. MANIFESTS

1. <input type="checkbox"/> Facility uses manifest system or wastes reclaimed under contractual agreement - 260.380.1(6) RSMo, and 10 CSR 25-5.262(2)(B)	GMR	<p>COMMENTS</p> <p><i>All paperwork was taken by previous owner</i></p> <p><i>None Shipped since ownership change</i></p> <p><i>No manifests to review</i></p>
2. <input type="checkbox"/> Generator maintains a copy of the contractual agreement on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(e)(2)	GMR	
3. <input type="checkbox"/> Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)	GRR	
4. <input type="checkbox"/> Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(2)(B)	GOR	
5. <input type="checkbox"/> Manifest document, ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A	GOR	
6. <input type="checkbox"/> Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)1.	GMR	
7. <input type="checkbox"/> All transporters' names, phone numbers, license plate #s, MO & EPA I.D.#s - 10 CSR 25-5.262(2)(B)2.	GMR	
8. <input type="checkbox"/> Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)1.	GMR	
9. <input type="checkbox"/> DOT shipping name, Hazard Class and waste I.D. # (RQ - If required) - 10 CSR 25-5.262(2)(B)2.	GMR	
10. <input type="checkbox"/> Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)(B)2.	GMR	
11. <input type="checkbox"/> Manifest signed and dated - 10 CSR 25-5.262(2)(B)1.	GMR	
12. <input type="checkbox"/> Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A	GOR	
13. <input type="checkbox"/> Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1	GOR	
14. <input type="checkbox"/> Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C	GRR	
15. <input type="checkbox"/> Summary Manifest Reports and manifest copies sent to DNR quarterly - 10 CSR 25-5.262(2)(D)1	GOR	
16. <input type="checkbox"/> Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	
17. <input type="checkbox"/> "Land-Ban" notification/certification sent with manifests or with 1st shipment under a tolling agreement & retained on-site for 5 years - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	
18. <input type="checkbox"/> Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	

G. PREPAREDNESS AND PREVENTION

1. <input checked="" type="checkbox"/> Arrangements with local emergency agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37	GPT	<p>COMMENTS</p> <p><i>f. dept. & EMT's</i></p>
2. <input checked="" type="checkbox"/> Emergency coordinator(s) on premise or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(i)	GSQ	

H. WASTE OIL

1. <input checked="" type="checkbox"/> Waste oil is managed properly and not disposed of into the environment - 10 CSR 25-11.010(1)(D).	GOR	COMMENTS
2. <input checked="" type="checkbox"/> Listed hazardous waste mixed with waste oil is handled as a hazardous waste - 10 CSR 25-11.010(1)(C)2.	GOR	
3. <input checked="" type="checkbox"/> Registered as waste oil generator if gen./accum. 220 lb. - 10 CSR 25-11.010(2)(A)	GOR	
4. <input checked="" type="checkbox"/> Written waste oil contract maintained - 10 CSR 25-11.010(4)(C)	GOR	
5. <input checked="" type="checkbox"/> Uses a licensed transporter and receiving facility - 10 CSR 25-11.010(4)	GOR	

I. RESOURCE RECOVERY

COMMENTS

2. ☐ **Facility is classified as U, R1, or R2 accurately - 10 CSR 25-9.020(3)(A).** GOR
3. ☐ **Facility meets the operating conditions of certification - 10 CSR 25-9.020(3).** GOR
4. ☐ **Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E)1 and 2.** GOR
5. ☐ **Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.** GOR
6. ☐ **Facility maintains a complete written operating record - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) and (2) as modified by 10 CSR 25-7.264(2)(E)2.** GOR
7. ☐ **Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103.** GOR

*Burn W.O.
No distillation of solvents*

CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN

INSPECTOR'S SIGNATURE

Charles L. Gaeger

DATE

9-22-94